

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

ELIAS SANCHEZ SIFONTE and
VALERIE RODRIGUEZ ERAZO,

Plaintiffs,

Case No.:

vs.

JOSUE FONSECA, *et al.*,

Defendants.

_____ /

DECLARATION OF GABRIELA KORNZWEIG

I, Gabriela Kornzweig, declare as follows:

1. I am Vice President and Corporate Secretary for NBCUniversal Media, LLC. I make this declaration in support of the Notice of Removal filed by Defendant Telemundo of Puerto Rico LLC and the other defendants in the above-styled action.

2. I am over the age of 18 and understand the obligations of an oath. The information in this declaration is true and correct based on my personal knowledge and my review of NBCUniversal, LLC, Telemundo International Studios LLC, Telemundo Internacional LLC, Telemundo Network Group LLC, and Telemundo of Puerto Rico LLC's corporate records, which are maintained in the regular course of business and are available to me as part of my regular duties.

I. Citizenship and Membership of NBCUniversal Media, LLC

3. NBCUniversal Media, LLC is a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York. As set forth in detail below, NBCUniversal Media, LLC is a citizen of the state of Delaware and the commonwealth of Pennsylvania because those are the only states where the corporations in its

chain of membership are incorporated or have their principal places of business.

4. NBCUniversal Media, LLC's sole member is NBCUniversal, LLC.

5. The members of NBCUniversal, LLC are: (i) Comcast DW Holding, Inc., a Delaware corporation with its principal place of business in Pennsylvania; (ii) NBCUniversal Enterprise, Inc., a Delaware corporation with its principal place of business in Pennsylvania; (iii) SNL Entertainment Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania; (iv) Comcast CCW Holdings, LLC; (v) Comcast Navy Acquisition, LLC; (vi) Comcast Snap Holdings II, LLC; and (vii) Comcast Navy Contribution, LLC.

**Membership of Comcast CCW Holdings, LLC,
Comcast Navy Acquisition, LLC, and Comcast Snap Holdings II, LLC,**

6. The members of Comcast CCW Holdings, LLC are: (i) Comcast Navy Acquisition, LLC; and (ii) Comcast Snap Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania.

7. The sole member of Comcast Navy Acquisition, LLC is Comcast Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania.

8. The members of Comcast Snap Holdings II, LLC are: (i) Comcast Navy Acquisition, LLC; and (ii) Comcast Snap Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania.

Membership of Comcast Navy Contribution, LLC

9. The members of Comcast Navy Contribution, LLC are: (i) E! Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania; (ii) Versus Holdings, LLC; (iii) Comcast Contribution Holdings, LLC; (iv) Comcast CHC, LLC; (v) Comcast SportsNet Philadelphia Holdings, LLC; and (vi) Comcast SportsNet New England Holdings, LLC.

Membership of Versus Holdings, LLC

10. The members of Versus Holdings, LLC are: (i) Comcast Holdings Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania; and (ii) E! Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania.

**Membership of Comcast Contribution Holdings,
LLC**

11. The sole member of Comcast Contribution Holdings, LLC is Comcast Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania.

Membership of Comcast CHC, LLC

12. The sole member of Comcast CHC, LLC is Comcast Holdings Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania.

**Membership of Comcast SportsNet
Philadelphia Holdings, LLC**

13. The members of Comcast SportsNet Philadelphia Holdings, LLC are: (i) Comcast Holdings Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania; and (ii) Comcast Spectacor Holding Company, LLC.

14. The sole member of Comcast Spectacor Holding Company, LLC is Comcast Holdings Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania.

**Membership of Comcast SportsNet
New England Holdings, LLC**

15. The members of Comcast SportsNet New England Holdings, LLC are: (i) Comcast SportsNet NE Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania; and (ii) CSNNE Partner, LLC.

16. The sole member of CSNNE Partner, LLC is Comcast Holdings Corporation, a

Pennsylvania corporation with its principal place of business in Pennsylvania.

II. Citizenship and Membership of Telemundo International Studios LLC, Telemundo Internacional LLC, and Telemundo Network Group LLC

17. Telemundo International Studios LLC is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida. As set forth in detail below, Telemundo International Studios LLC is a citizen of the state of Delaware and the commonwealth of Pennsylvania because those are the only states where the corporations in its chain of membership are incorporated or have their principal places of business.

18. The sole member of Telemundo International Studios LLC is Telemundo Network Group LLC.

19. Telemundo Internacional LLC is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida. As set forth in detail below, Telemundo Internacional LLC is a citizen of the state of Delaware and the commonwealth of Pennsylvania because those are the only states where the corporations in its chain of membership are incorporated or have their principal places of business.

20. The sole member of Telemundo Internacional LLC is Telemundo Network Group LLC.

21. Telemundo Network Group LLC is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida. As set forth in detail below, Telemundo Network Group LLC is a citizen of the state of Delaware and the commonwealth of Pennsylvania because those are the only states where the corporations in its chain of membership are incorporated or have their principal places of business.

22. The sole member of Telemundo Network Group LLC is Telemundo Media LLC.

23. The members of Telemundo Media LLC are: (i) NBC Subsidiary (WTVJ-TV)

LLC; and (ii) NBCUniversal Media, LLC, which as set forth in Section I above is a citizen of the state of Delaware and the commonwealth of Pennsylvania.

24. The sole member of NBC Subsidiary (WTVJ-TV) LLC is NBC Stations Management II LLC.

25. The sole member of NBC Stations Management II LLC is NBC Stations Management LLC.

26. The sole member of NBC Stations Management LLC is NBCUniversal Media, LLC, which as set forth in Section I above is a citizen of the state of Delaware and the commonwealth of Pennsylvania.

III. Citizenship and Membership of Telemundo of Puerto Rico LLC

27. Telemundo of Puerto Rico LLC is a limited liability company organized under the laws of Puerto Rico with its principal place of business in Florida. As set forth in detail below, Telemundo of Puerto Rico LLC is a citizen of the state of Delaware and the commonwealth of Pennsylvania because those are the only states where the corporations in its chain of membership are incorporated or have their principal places of business.

28. The sole member of Telemundo of Puerto Rico LLC is WKAQ Holdings LLC.

29. The sole member of WKAQ Holdings LLC is NBC Telemundo License LLC.

30. The sole member of NBC Telemundo License LLC is NBC Telemundo LLC.

31. The sole member of NBC Telemundo LLC is NBC Telemundo License Holding LLC.

32. The members of NBC Telemundo License Holding LLC are: (i) Estrella Communications LLC; (ii) KNTV License LLC; (iii) NBC Stations Management LLC; (iv) NBC Subsidiary (KNBC-TV) LLC; (v) NBC Subsidiary (WCAU-TV), L.P.; (vi) NBC Subsidiary (WMAQ-TV) LLC; (vii) NBC Subsidiary (WRC-TV) LLC; (viii) NBCUniversal Media, LLC;

(ix) Outlet Broadcasting LLC; (x) Telemundo Group LLC; (xi) Telemundo of Arizona LLC; (xii) Telemundo of Chicago LLC; (xiii) Telemundo of Denver LLC; (xiv) Telemundo of Florida LLC; (xv) Telemundo of Fresno LLC; (xvi) Telemundo of New England LLC; (xvii) Telemundo of Northern California LLC; (xviii) Telemundo of Texas LLC; (xix) Video 44 Acquisition LLC; and (xx) WNJU-TV Broadcasting LLC.

Membership of Video 44 Acquisition LLC

33. The sole member of Video 44 Acquisition LLC is Telemundo of Chicago LLC.

Membership of Telemundo of Texas LLC,
Telemundo of Florida LLC,
Estrella Communications LLC,
WNJU-TV Broadcasting LLC,
Telemundo of Northern California LLC,
Telemundo of Chicago LLC,
and Telemundo of Denver LLC

34. Telemundo Group LLC is the sole member of each of the following: (i) Telemundo of Texas LLC; (ii) Telemundo of Florida LLC; (iii) Estrella Communications LLC; (iv) WNJU-TV Broadcasting LLC; (v) Telemundo of Northern California LLC; (vi) Telemundo of Chicago LLC; and (vii) Telemundo of Denver LLC.

Membership of Telemundo of Arizona LLC,
Telemundo of Fresno LLC,
Telemundo of New England LLC,
and Telemundo Group LLC

35. Telemundo Media LLC is the sole member of each of the following: (i) Telemundo of Arizona LLC; (ii) Telemundo of Fresno LLC; (iii) Telemundo of New England LLC; and (iv) Telemundo Group LLC.

36. The membership of Telemundo Media LLC is set forth in Paragraphs 23-26 above.

Membership of NBC Subsidiary (WCAU-TV), L.P.,
and NBC Stations Management LLC

37. The members of NBC Subsidiary (WCAU-TV), L.P. are: (i) WCAU Holdings, LLC; and (ii) NBC-Rainbow Holding LLC.

38. The sole member of WCAU Holdings, LLC is NBC-Rainbow Holding LLC.

39. The members of NBC-Rainbow Holding LLC are: (i) NBC Stations Management II LLC; (ii) NBCU Cable Entertainment Holding LLC; and (iii) NBC Stations Management LLC.

40. The sole member of NBC Stations Management II LLC is NBC Stations Management LLC.

41. The sole member of NBCU Cable Entertainment Holding LLC is NBCUniversal Media, LLC, which as set forth in Section I above is a citizen of the state of Delaware and the commonwealth of Pennsylvania.

42. The sole member of NBC Stations Management LLC is NBCUniversal Media, LLC, which as set forth in Section I above is a citizen of the state of Delaware and the commonwealth of Pennsylvania.

Membership of NBC Subsidiary (WMAQ-TV), L.P.

43. The members of NBC Subsidiary (WMAQ-TV) L.P. are: (i) NBC Stations Management LLC, the membership of which is set forth in Paragraph 42 above; and (ii) NBCUniversal Media, LLC, which as set forth in Section I above is a citizen of the state of Delaware and the commonwealth of Pennsylvania.

**Membership of Outlet Broadcasting LLC,
NBC Subsidiary (KNBC-TV) LLC,
NBC Subsidiary (WRC-TV) LLC,
and KNTV License LLC**

44. The sole member of Outlet Broadcasting LLC is Outlet Communications LLC.

45. The sole member of KNTV License LLC is KNTV Television LLC.

46. NBCUniversal Media, LLC is the sole member of each of the following: (i) Outlet

Communications LLC; (ii) KNTV Television LLC; (iii) NBC Subsidiary (WRC-TV) LLC; and (iv) NBC Subsidiary (KNBC-TV) LLC.

45. As set forth in Section I above, NBCUniversal Media, LLC is a citizen of the state of Delaware and the commonwealth of Pennsylvania.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 8, 2021


Gabriela Kornzweig